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Attorneys for Plaintiff,  
THOMAS WILLIAMS, Ph.D.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

THOMAS WILLIAMS, Ph.D.,  
Plaintiff,  
v.

COUNTY OF SACRAMENTO; CITY OF  
RANCHO CORDOVA; NATHAN DANIEL;  
JOSEPH ZALEC; DEREK HUTCHINS and  
DOES 1 through 50 inclusive,  
Defendants.

CARLOS WILLIAMS,  
Plaintiff,  
v.

COUNTY OF SACRAMENTO; RANCHO  
CORDOVA POLICE DEPARTMENT; and  
DOES 1 through 50, inclusive,  
Defendants.

Case No.: 2:20-cv-00598-TLN-KJN  
Case No.: 2:19-cv-02345-TLN-KJN

**JOINT STIPULATION AND ORDER TO  
CONTINUE PRE-TRIAL DEADLINES**

Action Filed: March 18, 2020  
Trial Date: Not Set

1 Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and  
2 Defendants COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN  
3 DANIEL, JOSEPH ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and  
4 through their (“Parties”) counsel of record, hereby stipulate and request that the Court continue  
5 the deadlines for expert witness disclosures and supplemental expert witness disclosures for 45  
6 days. Good cause exists for the requested continuance pursuant to Federal Rules of Civil  
7 Procedure Rule 16(d) based upon the following:

8 1. On July 15, 2021, this Court consolidated the above-referenced cases with respect  
9 to discovery only.

10 2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an  
11 Amended Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the  
12 same Order on October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

13 3. On April 6, 2022, this Court granted the Parties’ joint stipulation to extend the pre-  
14 trial deadlines, which extended the fact discovery deadline to January 12, 2023.

15 4. On January 19, 2023, this Court granted the Parties’ joint stipulation to extend  
16 discovery deadlines for the limited purposes of completing the defendant deputies’ depositions,  
17 facilitating the production of records pursuant to the Court’s January 6, 2023 Order [Dkt. Nos. 43  
18 & 48], and having Plaintiffs’ expert examine the physical camera that was in Deputy Daniel’s  
19 vehicle on the night of the incident and subsequently removed. This Court also granted the Parties’  
20 request to extend expert disclosure and dispositive motions dates.

21 On June 5, 2023, this Court granted the Parties’ joint stipulation to extend expert  
22 disclosure and dispositive motions dates, as the parties were working diligently to prepare and  
23 gather expert reports and agreed that more time was needed for the experts to finalize their reports.

24 6. The Parties are now requesting one final extension of the expert disclosure and  
25 dispositive motions dates due to an issue with Mr. Scott DeFoe, one of Plaintiff’s experts. Mr.  
26 DeFoe recently had a death in the family and is experiencing other family issues, causing him to  
27 travel across the Country. As such, Defendants graciously agreed to stipulate to extend out these  
28 deadlines to allow Mr. DeFoe to attend to his family and then complete his expert report.

7. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to respectfully request that the Court modify the scheduling order as follows:

Event	Schedule	Proposed New Schedule
Expert Witness Disclosure	July 27, 2023	August 31, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Within 45 days after designation of expert witnesses: October 16, 2023
Dispositive Motions	November 13, 2023	January 8, 2024

Date: July 24, 2023

By: /s/ Kelsey K. Ciarimboli, Esq.  
 LAWRENCE A. BOHM, ESQ.  
 KELSEY K. CIARIMBOLI, ESQ.  
 DANIEL T. NEWMAN, ESQ.  
 GREGORY R. DAVENPORT, ESQ.

Attorneys for Plaintiffs,  
 CARLOS WILLIAMS and  
 THOMAS WILLIAMS

Date: July 24, 2023

By: /s/ Jennifer L. Thompson, Esq.  
 CARL L. FESSENDEN, ESQ.  
 JOHN R. WHITEFLEET, ESQ.  
 JENNIFER L. THOMPSON, ESQ.

Attorneys for Defendant,  
 RANCHO CORDOVA POLICE  
 DEPARTMENT

Date: July 24, 2023

By: /s/ Van Longyear, Esq.  
 VAN LONGYEAR, ESQ.

Attorneys for Defendant,  
 COUNTY OF SACRAMENTO

**ORDER**

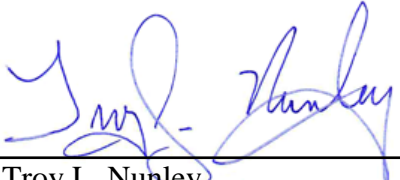
Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

Event	Schedule	New Schedule
Expert Witness Disclosure	July 27, 2023	August 31, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Within 45 days after designation of expert witnesses: October 16, 2023
Dispositive Motions	November 13, 2023	January 8, 2024

**IT IS SO ORDERED.**

Dated: July 24, 2023

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge

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